United States Department of the Interior Bureau of Land Management

Categorical Exclusion DOI-BLM-CO-SO50-2015-0037 CX

July 2015

SMPA Nucla Substation Upgrade

Location: Western Montrose County south of Nucla, CO.

U.S. Department of the Interior Bureau of Land Management Uncompanyer Field Office 2465 South Townsend Avenue Montrose, CO 81401 Phone: (970) 240-5300



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CATEGORICAL EXCLUSION

NUMBER: DOI-BLM-CO-S050-2015-0037 CX

CASEFILE: COC-30188, COC-69824, COC-68253 and COC-35407

PROJECT NAME: SMPA Nucla Substation Upgrade

PLANNING UNIT: San Juan/San Miguel Resource Management Unit

LEGAL DESCRIPTION: New Mexico Principal Meridian, CO

T. 46 N., R. 16 W.,

sec. 13, NW1/4NE1/4 and NE1/4NW1/4.

<u>APPLICANT</u>: San Miguel Power Association (SMPA)

<u>BACKGROUND</u>: SMPA has filed an application requesting authorization to perform upgrades to their Nucla substation. This upgrade will consist of several construction activities and will involve four separate rights-of-way (ROWs).

COC-30188

- This existing ROW was granted to SMPA for the construction, operation and maintenance of the Nucla substation and the adjacent breaker station. The ROW granted an area of 102' x 106' for the substation and 50' x 95' for the breaker station, containing approximately 0.36 acres.
- SMPA has requested a partial relinquishment of this ROW for the breaker station. All of the equipment in the breaker station including the enclosure fence will be removed and the 50' x 95' area will be reclaimed. In replacement of the removed equipment, SMPA proposes to install one steel monopole approximately 50-75 feet tall with switching equipment adjacent to the west side of the footprint of the removed breaker station.
- In addition, SMPA proposes to replace an older galvanized, corrugated steel building that is approximately 10' x 15', with a new desert-tan painted, pre-engineered steel building that measures 10'8" x 16' and will be placed on a concrete pad. This new building will go in the same approximate location in the northwest corner of the substation within the chain-link fence enclosure.
- SMPA will also be upgrading the transformers and breakers in the substation.

• Lastly, SMPA proposes to install two new poles just to the south of the substation next to the access road. These poles will allow for the installation of an overhead static line for lightning ground protection.

COC-69824

- This existing ROW was granted to SMPA for the construction, operation and maintenance of a 69 kV power transmission line.
- SMPA proposes to realign this power line just to the north of the breaker station and the substation, approximately 50' from the existing alignment. This new alignment will consist of installing four new power poles that will be installed over a distance of approximately 1500' and will be contained within the existing ROW.

COC-68253

- This existing ROW was granted to SMPA for the construction, operation and maintenance of a 69 kV power transmission line.
- The removal of the breaker station equipment will also remove the last power pole on this line before it enters the substation which in inside the breaker station.
- SMPA proposes to replace this pole by moving it approximately 25' to the southwest of its current location. This will move it from just inside of the breaker station enclosure to just outside the enclosure, but will still be within the ROW for the power line.

COC-35407

- This existing ROW was granted to SMPA for the construction, operation and maintenance of 7.2 kV/12.5 power distribution lines that are co-located on the same power poles.
- SMPA proposes to install three temporary poles on this power distribution line approximately 100' to the east of the substation and within the existing ROW. These poles are necessary to insure the stability and safety of the upgrade project. Although these poles are proposed as temporary, they may remain installed as a part of the permanent infrastructure.

<u>DESCRIPTION OF PROPOSED ACTION</u>: The proposed action is to issue the appropriate amendments and authorizations for SMPA to perform the proposed upgrades to the Nucla substation. These will include:

COC-30188 - Amending the ROW to increase the ROW dimensions to 150' x 150' which would incorporate all the disturbed and maintained area of the substation and allow for the installation of the two new poles for the static line installation; authorizing the building replacement within the substation; authorizing a ROW area 25' x 25' for the installation and maintenance of the steel monopole with switching equipment to replace the breaker station; and processing the partial relinquishment and reclamation of the breaker station site. The amended ROW dimensions will contain approximately 0.53 acres. The additional acreage will all be within existing disturbed areas that are currently being maintained.

The amendment would be issued under FLPMA and the existing ROW expires in 2041 with the right of renewal. The amendment would be subject to the stipulations in Exhibit

A. SMPA's facilities are recognized under the Rural Electrification Act and are rental exempt.

COC-69824 – Administrative correction of the ROW from 50' to the intended 100' total width as described in the NEPA document for the renewal of this grant in 2006' (CO-150-2006-0025 CE); and amending the ROW to include the installation of the four new power poles for the new alignment. This new alignment will be near but within the northern edge of the 100' ROW.

The amendment would be issued under FLPMA and the existing ROW expires in 2036 with the right of renewal. The amendment would be subject to the stipulations in Exhibit A. SMPA's facilities are recognized under the Rural Electrification Act and are rental exempt.

COC-68253 - Authorizing the installation of the replacement pole within the ROW for the pole removed with the breaker station.

COC-35407 - Authorizing the installation of the three temporary power poles necessary for the upgrade. These temporary poles may or may not be removed at the end of the upgrade project.

<u>PLAN CONFORMANCE REVIEW</u>: The Proposed Action is subject to and has been reviewed for conformance with the following plan (43 CFR 1610.5-3, BLM 1617.3):

Name of Plan: San Juan/San Miguel Planning Area Resource Management Plan

Date Approved: September 1985

<u>Decision Number/Page</u>: Area Ec: Emphasis on Mineral Development (Future Coal Leasing Area)/Page 41

<u>Decision Language</u>: Major utility corridors would be allowed as long as they don't conflict with mineral development.

Decision Number/Page: Area H: Emphasis on Public Land Disposal/Page 48

<u>Decision Language</u>: Provide for disposal of the public lands. Major utility corridors would be allowed. Allow other land actions to proceed, especially when there is a clear & significant public need.

<u>CATEGORICAL EXCLUSION REVIEW</u>: The proposed action qualifies as a categorical exclusion under 516 DM 11.9, Number E.13, which allows "Amendments to existing rights-of-way, such as the upgrading of existing facilities, which entail no additional disturbances outside the right-of-way boundary" and E. 16 which allows "Acquisition of easements for existing road or issuance of leases, permits, or rights-of-way for the use of existing facilities, improvements, or sites for the same or similar purpose."

None of the following exceptions in 516 DM 2, Appendix 2, apply.

1. 2.	Exclusion Have significant adverse effects on public health and safety. Have significant impacts on such natural resources and unique geographic characteristics as historic or cultural resources; park, recreation, or refuge lands; wilderness areas; wild or scenic rivers;	YES	NO X
3.	national natural landmarks; sole or principal drinking water aquifers; prime farmlands; wetlands, floodplains; national monuments; migratory birds; and other ecologically significant or critical areas. Have highly controversial environmental effects or involve unresolved conflicts concerning alternative uses of available resources.		_ <u>X</u> _
			<u>X</u>
4.	Have highly uncertain and potentially significant environmental effects or involve unique or unknown environmental risks.		X
5.	Establish a precedent for future action or represent a decision in principle about future actions with potentially significant environmental effects.		
_			<u>X</u>
6.	Be directly related to other actions with individually insignificant but cumulatively significant environmental effects.		v
7	Have significant impacts on properties listed, or eligible for listing, in the		<u>X</u>
	National Register of Historic Places.		X
8.	Have significant impacts on species listed, or proposed to be listed, on the List of Endangered or Threatened Species, or have adverse effects on		
	designated Critical Habitat for these species.		<u>X</u>
9.	Violate a Federal law, or a State, local or tribal law or requirement		37
10	imposed for the protection of the environment. Have disproportionately high and adverse effect on low income or		<u>X</u>
10.	minority populations.		X
11.	Limit access to and ceremonial use of Indian sacred sites by Indian		
	religious practitioners or adversely affect the physical integrity of such		
10	sacred sites.		<u>X</u>
12.	Contribute to the introduction, continued existence, or spread of noxious weeds or non-native invasive species known to occur in the area or		
	actions that may promote the introduction, growth, or expansion of the		
	range of such species.		<u>X</u>

INTERDISCIPLINARY REVIEW:

Name	Title	Area of Responsibility
Nick Szuch	Realty Specialist	Lands and Realty
Glade Hadden	Archaeologist	Cultural, Native American Religious Concerns
Ken Holsinger	Biologist	T&E, Migratory Birds, Vegetation

REMARKS:

Cultural Resources: The entire proposed project is situated in previously disturbed surface and is exempted from inventory requirements under the provisions of BLM 8110.23B1 and 8110.23B3. No further work is required.

Native American Religious Concerns: There are none known or anticipated for this project.

Threatened and Endangered Species: There are no threatened or endangered species (i.e. listed under the Endangered Species Act), that inhabit or derive important use from the project area.

Migratory Birds: To minimize impacts on migratory bird populations, it is recommended that no surface disturbing activities occur from May 15 through July 15. This timeframe encompasses the core breeding season for the majority of migratory birds in the project area. Project activities shall retain and avoid modifying identified cavity trees, snags, and perches in the project area.

Powerlines and transmission facilities design shall comply with guidelines in the publication, Suggested Practices for Avian Protection on Power Lines: The State of the Art in 2006 (http://www.aplic.org/).

NAME OF PREPARER: Nick Szuch

July 15, 201

NAME OF ENVIRONMENTAL COORDINATOR: Jedd Sondergard

COMPLIANCE WITH NEPA

The Proposed Action is categorically excluded from further documentation under the National Environmental Policy Act (NEPA) in accordance with 516 DM 11.9, E.13 and E.16. This categorical exclusion is appropriate in this situation because there are no extraordinary circumstances potentially having effects that may significantly affect the environment. The Proposed Action has been reviewed, and none of the extraordinary circumstances described in 516 DM 2 apply.

SIGNATURE OF AUTHORIZED OFFICIAL:

Barbara Sharrow.

Uncompangre Field Office, Field Manager

Attachments:

Exhibit A – Stipulations

Exhibit B - Maps

Exhibit A COC-30188 Amendment No. 1 COC-69824 Amendment No. 1

STIPULATIONS

- 1. The holder shall contact the authorized officer at least five days prior to the anticipated start of construction and/or any surface disturbing activities. For emergencies, the holder will contact the BLM as soon as possible after maintenance activities. The authorized officer may require and schedule a preconstruction conference with the holder prior to the holder's commencing construction and/or surface disturbing activities on the right-of-way. The holder and/or its representative shall attend this conference. The holder's contractor, or agents involved with construction and/or any surface disturbing activities associated with the right-of-way, shall also attend this conference to review the stipulations of the grant. The BLM authorized representative is Barney Buria, Environmental Protection Specialist, who can be reached at the Uncompahgre Field Office, 2465 South Townsend, Montrose, Colorado 81401 or phone at (970) 240-5333. An alternate contact is Nick Szuch, Realty Specialist, Uncompahgre Field Office, (970) 240-5322.
 - 2. The holder shall construct, operate and maintain the facilities, improvements and structures within this right-of-way in conformance with the terms, conditions and stipulations contained herein. Any relocation, additional construction, or use that is not in accord with the approved conditions shall not be initiated without the prior written approval of the authorized officer. A copy of the complete right-of-way grant, including all plans and stipulations shall be made available at the right-of-way site during construction. Noncompliance with the above will be grounds for an immediate temporary suspension of activities if it constitutes a threat to public health or the environment.
 - 3. Any cultural and/or paleontological resource (historic or prehistoric site or object) discovered by the holder, or any person working on its behalf, on public or Federal land shall be immediately reported to the authorized officer. Holder shall suspend all operations in the immediate area of such discovery until written authorization to proceed is issued by the authorized officer. An evaluation of the discovery will be made by the authorized officer to determine appropriate actions to prevent the loss of significant cultural or scientific values. The holder will be responsible for the cost of evaluation and any decision as to proper mitigation measures will be made by the authorized officer after consulting with the holder.
 - 4. Pursuant to 43 CFR 10.4(g), the holder of this authorization must notify the authorized officer, by telephone, with written confirmation, immediately upon the discovery of human remains, funerary items, sacred objects, or objects of cultural patrimony. Further, pursuant to 43 CFR 10.4(c) and (d), you must stop activities in the vicinity of the discovery and protect it for 30 days or until notified to proceed by the authorized officer.

- 5. Use of pesticides/herbicides shall comply with the applicable Federal and state laws. Pesticides/herbicides shall be used only in accordance with their registered uses and within limitations imposed by the Secretary of the Interior. Prior to the use of pesticides/herbicides, the holder shall obtain from the authorized officer written approval of the applicant's plan showing the type and quantity of material to be used, pest(s) to be controlled, method of application, location of storage and disposal of containers, and any other information deemed necessary by the authorized officer. The plan should be submitted no later than March 1 of any calendar year to cover the proposed activities for the next growing season. Emergency use of pesticides/herbicides shall be approved in writing by the authorized officer prior to such use.
- 6. The holder shall be responsible for weed control within the limits of the right-of-way. The holder is responsible for consultation with the authorized officer and/or local authorities for acceptable weed control methods (within limits imposed in the grant stipulations) including pesticides/herbicides approved for use on BLM land.
- 7. The holder shall comply with applicable State standards for public health and safety, environmental protection and siting, construction, operation and maintenance, if these State standards are more stringent than Federal standards for similar projects.
- 8. The holder shall comply with all applicable Federal laws and regulations existing or hereafter enacted or promulgated regarding toxic substances or hazardous materials. In any event, the holder shall comply with the Toxic Substances Control Act of 1976, as amended (15 U.S.C. 2601, et seq.) with regard to any toxic substances that are used, generated by or stored on the right-of-way or on facilities authorized under this right-of-way grant. (See 40 CFR, Part 702-799 and especially, provisions on polychlorinated biphenyls, 40 CFR 761.1-761.193.) Additionally, any release of toxic substances (leaks, spills, etc.) in excess of the reportable quantity established by 40 CFR, Part 117 shall be reported as required by the Comprehensive Environmental Response, Compensation and Liability Act of 1980, section 102b. A copy of any report required or requested by any federal agency of state government as a result of a reportable release or spill of any toxic substances shall be furnished to the authorized officer concurrent with the filing of the reports to the involved Federal agency of State government.
- 9. The authorized officer may suspend or terminate in whole, or in part, any construction or maintenance activities, when in its judgment, unforeseen conditions arise which result in the approved terms and conditions being inadequate to protect the public health and safety or to protect the environment.
- 10. All construction, operation and maintenance shall be within the authorized limits of the right-of-way granted herein.
- 11. No burning of trash, litter, trees, brush or other vegetative material shall be allowed under this grant.

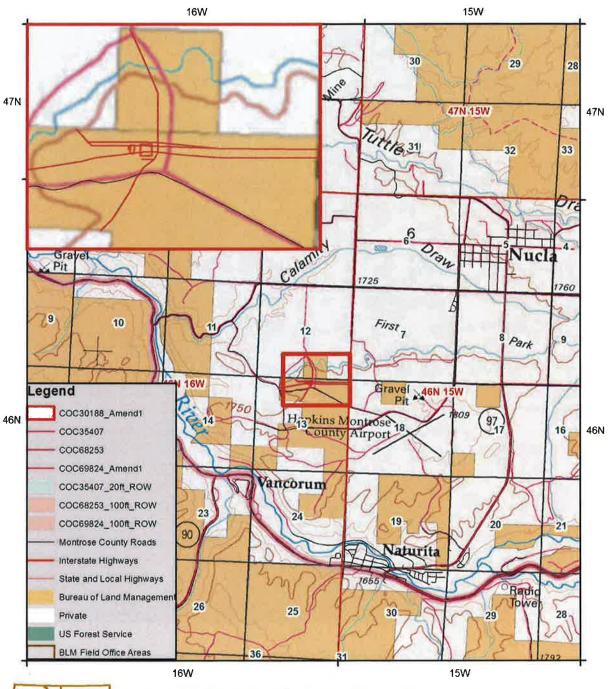
- 12. All brush, grasses, and other woody material cleared from the right-of-way shall be removed from the public land and not scattered on site; unless the debris is mulched and used for reclamation as natural materials to enhance surface stability and re-vegetation efforts.
- 13. No construction or routine maintenance activities shall be performed during periods when the soil is too wet to adequately support such equipment. If the equipment creates ruts in excess of four (4) inches deep, the soil shall be deemed too wet to adequately support the construction equipment. Emergency repairs to restore access are exempt; however, any damages to resources caused by emergency repairs during wet conditions will be repaired as directed by the authorized officer as soon as possible after the occurrence.
- 14. The holder shall disturb and remove only the minimum amount of soils and vegetation necessary for the construction, operation and maintenance of the right-of-way. Topsoil shall be conserved during excavation and reused as cover on disturbed areas to facilitate regrowth of vegetation. The holder shall re-contour disturbed areas as necessary by grading to restore the area to approximately the original contour of the ground as directed by the authorized officer.
- 15. The holder shall seed all disturbed areas with the following seed mix. There shall be <u>no</u> primary or secondary noxious weed seed in the seed mixture. In addition, there should be no more than 0.5% total weed seed, less than 2% other seed, and no trash larger than ¼ inch in length. Seed shall not be stored in burlap bags. Seed going on projects less than 20 acres or less than 200 lbs. shall be tested, and the viability testing of seed shall be done in accordance with State law(s). Seed tests shall be less than one year old and can be from the company's seed test. Seed test documents can be from: a) certified "blue" tag(s); b) an independent seed lab test; or c) a seed lab analysis either by seed lot or by seed mix. Copies of the seed test documents shall be forwarded to the BLM, Uncompanier Field Office. Commercial seed shall be either certified or registered pure live seed (PLS). The seed container shall be tagged in accordance with State law(s) and available for inspection by the authorized officer. Only State Certified weed free mulch shall be used.

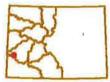
	A	В	С	D	E
Species	Desired % of planting	Multiplier (A x 0.01)	PLS lbs for full stand	PLS lbs per acre needed for mix (B x C)	PLS lbs per acre for project (D x # acres)
Western Wheatgrass (Pascopyrum smithii) Variety Arriba	35	0.35	10	3.5	
Bottlebrush squirreltail (Elymus elemoides)	20	0.20	8	1.6	
Indian Ricegrass (Acnatherum hymenoides) Variety Paloma	10	0.1	8	0.8	
Galleta Grass (Hilaria or Pleuraphis jamesii)	5	0.05	8	0.4	
Sand Dropseed (Sporobolus cryptandra)	5	0.05	1	0.05	
Needle and Thread (Stipa or Heterostipa comata)	5	0.05	10	0.5	
Scarlet Globernallow (Sphaeralcea coccinea)	2	0.02	3	0.06	
Annual Sunflower (<i>Helianthus annuus</i>)	3	0.03	10	0.3	
Rocky Mountain Penstemon (Penstemon strictus)	2	0.02	2	0.04	
Northern Sweet Vetch (Hedysarum boreale)	2	0.02	15	0.3	
Winterfat (<i>Eurotia</i> or <i>Krascheninnikovia lanata</i>)	1	0.01	5	0.05	
Four-Wing Saltbush (Atriplex canescens) from western Colorado, E Utah	5	0.05	6	0.3	
Wyoming Big Sagebrush (Artemisia tridentata wyomingensis)	5	0.05	1	0.05	
Totals	100	1.0		7.95	

The seed shall be evenly and uniformly planted over any disturbed areas. Seed shall be broadcast and the area shall be raked or chained to cover the seed. The seeding will be repeated until a satisfactory stand is established as determined by the authorized officer. Evaluation of growth will not be made before completion of the second growing season after seeding. The authorized officer is to be notified a minimum of two days prior to seeding of the project. Seeding shall be completed at a time of optimum soil moisture content, i.e., early spring or the fall.

- 16. For the reclamation of the breaker station: all surface gravel shall be removed and the site recontoured to approximate predisturbance terrain and drainage. Reclamation success will be deemed successful when the reclaimed site has achieved 70% of the closest adjacent undisturbed sagebrush community's herbaceous cover and composition of grasses and forbs. Such reclamation success shall be achieved prior to relinquishment of the ROW for this feature. To aid in a more expeditious achievement of the reclamation standard BLM recommends soil amendments since viable topsoil appears to be lacking and excluding livestock from the reclaimed site.
- 17. Typically at angles along the aerial alignment and at the final pole, guyed wires are required to anchor and stabilize the poles. The guyed wires and anchors typically require a small area approximately 30 feet outside of the designated right-of-way limits.
- 18. Powerlines, unless otherwise agreed to by the authorized officer in writing, shall be constructed in accordance to standards outlined in "Suggested Practices for Avian Protection on Powerlines: The State of the Art in 2006" (Avian Power Line Interaction Committee, 2006. Available at: http://www.aplic.org/uploads/files/2643/SuggestedPractices2006(LR-2).pdf). The holder shall assume the burden and expense of proving that pole designs not shown in the above publication are "eagle and raptor safe." Such proof shall be provided by a raptor expert approved by the authorized officer. The BLM reserves the right to require modifications or additions to all powerline structures placed on this right-of-way, should they be necessary to ensure the safety of large perching birds. Such modifications and/or additions shall be made by the holder without liability or expense to the United States. All pole replacements will be brought up to this standard. For all maintenance activities that involve, but are not limited to, nest relocation or destruction, temporary possession, depredation, salvage/disposal, harassment, and scientific collection of raptors, the rightof-way holder shall provide the BLM with a copy of their current Migratory Bird Permit for those activities.
- 19. It is the holder's responsibility to comply with all applicable Federal, State, and local laws and regulations existing or hereafter enacted or promulgated.
- 20. For access and maintenance of facilities, the holder shall use existing roads. When existing roads are not available, the holder may use the right-of-way for access. BLM roads should not be maintained without first consulting with the authorized officer.
- 21. Prior to termination of the right-of-way, the holder shall contact the authorized officer to arrange a joint inspection of the right-of-way. This inspection will be held to agree to an acceptable termination and rehabilitation plan as necessary. This plan shall include, but is not limited to, removal of facilities, drainage structures, or surface material, recontouring, topsoiling, or seeding. The authorized officer must approve the plan in writing prior to the holder's commencement of any termination activities.

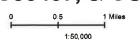
- 22. The holder shall conform to the following mitigation measures to ensure the project has no effect on any federally listed or sensitive species:
 - a. Construction activity and new surface disturbance will be prohibited during the period from December 1st to April 30th for the protection of elk and mule deer within winter and severe winter range. Any exceptions to this requirement must have prior written approval from the authorized officer.
 - b. To the extent possible, reptiles or amphibians observed in the project area will be avoided and will not be intentionally harmed.
 - c. Migratory Birds and Raptors: To minimize impacts on migratory bird populations, it is <u>recommended</u> that no surface disturbing activities occur from May 15th through July 15th.





No Warranty is made by the Bureau of Land Management as to the accuracy, reliability, or completeness of these data for individual use or aggregate use with other data.

SMPA Nucla Substation Upgrade COC-30188, COC-69824, COC35407, & COC-68253

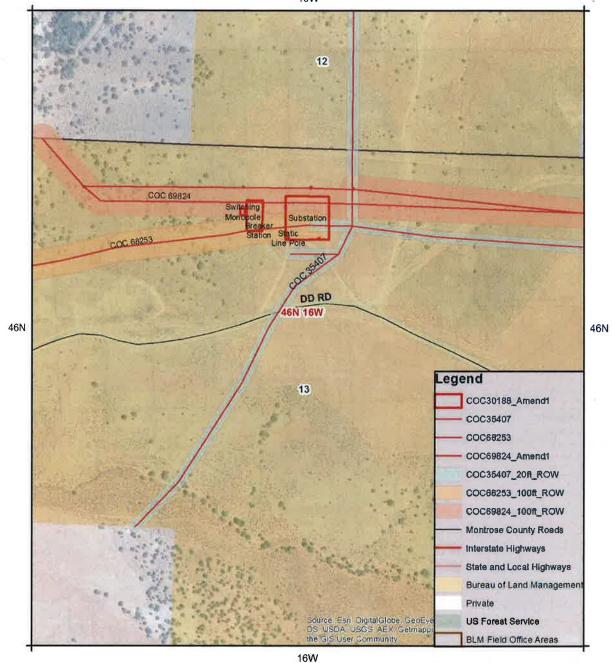


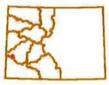
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Date 6/12/2015

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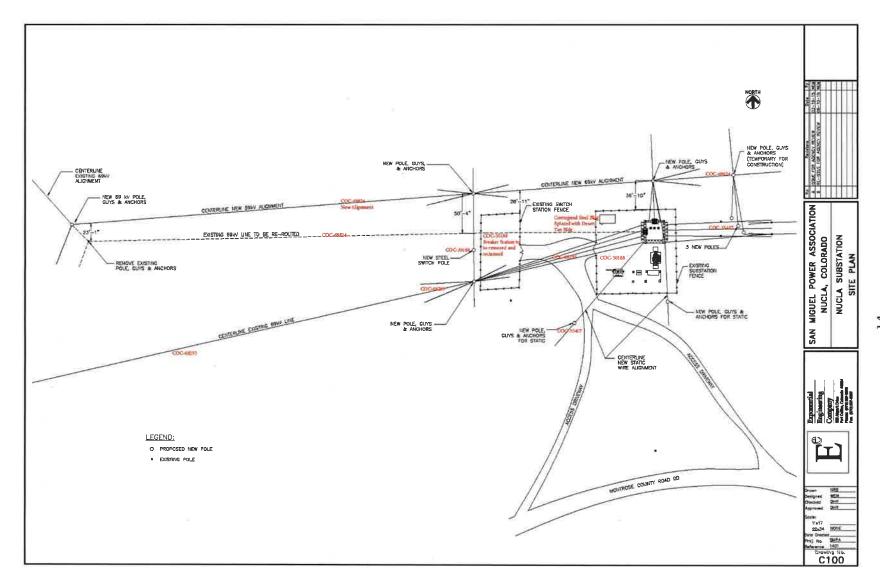
SMPA Nucla Substation Upgrade COC-30188, COC-69824, COC35407, & COC-68253



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U.S. Department of the Interior Bureau of Land Management Uncompander Field Office 2465 South Townsend Avenue Montrose, CO 81401

Decision Record

(DOI-BLM-CO-S050-2015-0037 CX)

PROJECT NAME: San Miguel Power Association (SMPA) Nucla Substation Upgrade

<u>DECISION</u>: It is my decision to issue an amendment to SMPA's right-of-way (ROW) COC-30188 to increase the ROW to 150' x 150' which would incorporate all the existing disturbed and maintained area of the substation and allow for the installation of the two new poles for the static line installation. The amendment would also authorize a ROW area 25' x 25' for the installation and maintenance of the steel monopole with switching equipment to replace the breaker station. These additional upgrades to the substation would also be authorized: the building replacement within the substation, the upgrade and replacement of aging breakers and transformers, and processing the partial relinquishment of the breaker station site once reclamation standards have been met.

In addition, SMPA's ROW COC-69824 will be administratively corrected to the intended 100' total width as described in the NEPA document for the renewal of this grant in 2006 (CO-150-2006-0025 CE). ROW COC-69824 will be amended to include the installation of the four new power poles for a new alignment. This new alignment will be near but within the northern edge of the 100' ROW.

It is also my decision to authorize the following actions for these ROW's:

COC-68253 - the installation of the replacement pole within the ROW for the pole removed within the breaker station.

COC-35407 - the installation of the three temporary power poles within the ROW necessary for the upgrade. These temporary poles may remain in place if SMPA determines that they are necessary for the long term needs of the powerline or substation.

MITIGATION MEASURES:

All stipulations shown in Exhibit A of the Categorical Exclusion (CX) will be followed.

RATIONALE:

The Proposed Action is categorically excluded from further documentation under the National Environmental Policy Act (NEPA) in accordance with 516 DM 11.9, E. 13 & E.16. These categorical exclusions are appropriate in this situation because there are no extraordinary circumstances potentially having effects that may significantly affect the environment. The

Proposed Action has been reviewed, and none of the extraordinary circumstances described in 516 DM 2 apply.

COMPLIANCE WITH MAJOR LAWS and CONFORMANCE WITH LAND USE PLAN:

The decision is in compliance with applicable laws, regulations and policy, including the Endangered Species Act, Migratory Bird Treaty Act and National Historic Preservation Act. It is also in conformance with the San Juan/San Miguel RMP.

PUBLIC COMMENT:

The BLM informed the public about this project by listing it on the online Uncompangre NEPA Register and a copy of the completed Categorical Exclusion will be posted on the NEPA website.

ADMINISTRATIVE REMEDIES:

If you are adversely affected by this decision, within 30 days of receipt of this decision you have the right of appeal to the Interior Board of Land Appeals, Office of the Secretary, in accordance with the regulations at 43 CFR §4.400. This decision goes into effect immediately and will remain in effect pending appeal unless a stay is granted (43 CFR §2801.10).

NAME OF PREPARER: Nick Szuch

July 15, 2015

NAME OF ENVIRONMENTAL COORDINATOR: Jedd Sonder

SIGNATURE OF AUTHORIZED OFFICIAL

Barbara Sharrow

Field Manager

Uncompangre Field Office